

## **EXHIBIT 6**

## Kadado, Charles

---

**From:** Kadado, Charles  
**Sent:** Tuesday, October 03, 2023 5:41 PM  
**To:** info@stopantisemitism.org; press@stopantisemitism.org  
**Cc:** Wassom, Brian; Farrar, Kelli  
**Subject:** URGENT - Retraction Demand  
**Attachments:** Retraction Demand to StopAntisemitism.com (10.3.2023).pdf

**Importance:** High

<b>Tracking:</b>	<b>Recipient</b>	<b>Delivery</b>
	info@stopantisemitism.org	
	press@stopantisemitism.org	
	Wassom, Brian	Delivered: 10/3/2023 5:41 PM
	Farrar, Kelli	Delivered: 10/3/2023 5:41 PM

Dear Ms. Reznichenko:

Please find the attached correspondence directed to your attention. Please contact us ASAP if you have any questions.

Thank you.

 **Charles C. Kadado | Associate**  
**Warner Norcross + Judd LLP**  
2715 Woodward Avenue, Suite 300, Detroit, MI 48201  
d 313.546.6174 | m 313.391.0970 | [ckadado@wnj.com](mailto:ckadado@wnj.com)

This email and any attachments are solely for the confidential use of the intended recipient. If you are not the intended recipient, please do not read, distribute or act in reliance on it or any attachments. If you received this email by mistake, please notify us immediately by email, and promptly delete this email and any attachments.

The attorney-client and work product privileges are not waived by the transmission of this email.



Dear Customer,

The following is the proof-of-delivery for tracking number: 773621568890

---

**Delivery Information:**

---

<b>Status:</b>	Delivered	<b>Delivered To:</b>	Residence
<b>Signed for by:</b>	S.SOFIA	<b>Delivery Location:</b>	3800 S OCEAN DR
<b>Service type:</b>	FedEx Priority Overnight		
<b>Special Handling:</b>	Deliver Weekday; Residential Delivery		HOLLYWOOD, FL, 33019
		<b>Delivery date:</b>	Oct 4, 2023 09:34

---

**Shipping Information:**

---

<b>Tracking number:</b>	773621568890	<b>Ship Date:</b>	Oct 3, 2023
		<b>Weight:</b>	0.5 LB/0.23 KG

**Recipient:**

Liora Reznichenko, StopAntisemitism  
3800 South Ocean Drive, Apt. 1025  
HOLLYWOOD, FL, US, 33019

**Shipper:**

Charles Kadado, Esq., Warner Norcross & Judd LLP  
2715 Woodward Ave.  
Ste. 300  
DETROIT, MI, US, 48201





Warner Norcross + Judd LLP

October 3, 2023

***Via Email and FedEx***

StopAntisemitism  
Liora Reznichenko  
3800 South Ocean Drive, Apt. 1025  
Hollywood, Florida 33019-2920  
[info@stopantisemitism.org](mailto:info@stopantisemitism.org)  
[press@stopantisemitism.org](mailto:press@stopantisemitism.org)

**Re: Retraction Demand**

Dear Ms. Reznichenko:

We represent the Druskinis family. I write to insist that you retract your provably false and defamatory statements about our client, and to cease and desist from spreading further false and defamatory untruths about him. **Specifically, you posted and/or stated at least the following false and defamatory statements:**



...

University of Michigan hockey has given Johnny Druskinis the boot after he was caught on camera spray painting swastikas onto the Jewish Resource Center during welcome week.

Thank you [@umichhockey](#) for creating actual consequences for antisemitism activity on your campus. [#twitterhockey](#)

See, X.com Post Dated September 30, 2023,  
<https://x.com/StopAntisemites/status/1708125586093207692?s=20>.

\* \* \* \*

**Additionally, you posted an article on stopantisemitism.org, which reads in part:**

A University of Michigan athlete has been suspended indefinitely from the school's men's hockey team for graffitiing antisemitic and homophobic messages on the sidewalk in front of the campus' Jewish Resource Center, according to a watchdog group that tracks antisemitic incidents across the world.

**Brian D. Wassom | Partner**

D 586.303.4139  
E [bwassom@wnj.com](mailto:bwassom@wnj.com)  
45000 River Ridge Drive, Suite 300  
Clinton Township, MI 48038-5582

StopAntisemitism told The Algemeiner on Monday that sophomore and now-former Wolverines defenseman Johnny Druskinis was caught in the act of graffitiing the hateful messages in broad daylight by a surveillance camera on the property. The group added that Druskinis was accompanied by a female companion, freshman lacrosse player Megan Minturn, noting that she has so far only been suspended and not removed from her team.

“Removal from the hockey team is not enough,” said StopAntisemitism CEO Liora Rez. “Antisemitism is prevalent on college campuses across the US, and the University of Michigan has a responsibility to either suspend or even expel this student if they are truly serious about fighting bigotry.”

The incident is the second reported act of antisemitism at the University of Michigan in the last few months. In another incident that happened over the summer, the house of Greek fraternity Sigma Alpha Mu was graffitied with a swastika and homophobic slur on two windows and the front door.

Other acts of hate have occurred at the University of Michigan in recent years.<sup>1</sup>

**Further, you indicated to at least the *Detroit Free Press*:**

“Fighting the nationwide campus antisemitism crisis requires recognizing that adults bear responsibility for their actions; if Michigan believed his disgusting behavior warranted dismissal from the hockey team, they should seriously consider suspending or expelling him from the university.”<sup>2</sup>

\* \* \* \*

**Separately, to *The Algemeiner Journal*, you indicated at least:**

“Removal from the hockey team is not enough. Antisemitism is prevalent on college campuses across the US, and the University of Michigan has a responsibility to either suspend or even expel this student if they are truly serious about fighting bigotry.”<sup>3</sup>

\* \* \* \*

---

<sup>1</sup> See *University of Michigan Athlete Suspended for Antisemitic Graffiti at Jewish Resource Center*, STOPANTISEMITISM.COM (October 2, 2023), <https://www.stopantisemitism.org/antisemitic-incidents-161/9o7d1c8nrpsk5m4jzt6awe62wy770q>.

<sup>2</sup> See Jared Ramsey, *Michigan hockey dismisses Johnny Druskinis for allegedly vandalizing Jewish site on campus*, DET. FREE PRESS (Oct. 3, 2023), <https://www.freep.com/story/sports/university-michigan/wolverines/2023/10/03/michigan-hockey-johnny-druskinis-antisemitic-vandalism/71042840007/>.

<sup>3</sup> See Dion J. Pierre, *University of Michigan Athletes Disciplined for Graffitiing Antisemitic Messages Outside Jewish Center, Watchdog Says*, THE ALGEMEINER (Oct. 2, 2023), <https://www.algemeiner.com/2023/10/02/university-michigan-athletes-disciplined-graffiti-antisemitic-messages-outside-jewish-center/>.

These statements are disturbing and dismaying because they are unfounded and demonstrably untrue. This letter serves as a formal retraction demand pursuant to MCL 600.2911(2)(b).

First, the Ann Arbor Police Department has already indicated that Mr. Druskinis had absolutely nothing to do with “spray painting swastikas,” as you falsely claim. Moreover, nowhere does the Ann Arbor Police Department Media Release indicate that “swastikas” were spray painted at all, nor do the attached photos show same:

Two suspects have been identified in connection with the incident that occurred at the Jewish Resource Center on 8/22/23. After a thorough investigation, it was determined the male suspect is responsible for spray painting a homophobic slur as well as male genitalia. The female suspect spray painted her initials. The graffiti was located on the sidewalk of the Jewish Resource Center.

Due to the victim in this case not wishing to prosecute, the case has been closed and no charges will be sought at this time. As an agency that strives for accountability and transparency, we have attached unedited images of the vandalism located at the JRC. No further statements will be issued in connection with this case.

Second, Rabbi Yitz Pierce, the program director of the Jewish Resource Center (“**JRC**”) has already indicated to you, via a direct message on X.com, that your statement is false. JRC has also published the following statement on its website:

The vandalism found at the JRC was offensive and disrespectful, but did not include any overt anti-semitic symbols (like swastikas). We have been in contact with those responsible and received a private apology, as well as a subsequent public apology. The public apology took place on Shabbat, in front of over 350 people. We deliberately chose Shabbat for the public apology, knowing it would not be recorded, and thus not contribute to further public attacks. We feel continued news coverage of this incident is unwarranted and unfortunate. From our perspective, it was put to rest weeks ago.

Echoing the Rabbi’s Shabbat night message: this vandalism took place during the Rosh Hashana and Yom Kippur season. While the theme of Rosh Hashana is judgment, the counter balancing theme of Yom Kippur is understanding and forgiveness. As far as the JRC is concerned, these students aren’t bad people and certainly don’t need to have their lives ruined. While they made a poor choice, they sincerely apologized, and we have high confidence they won’t repeat such actions ever again.

*See Exhibit 1*, Statement from The Jewish Resource Center Dated October 3, 2023.

“The elements of a defamation claim are: (1) a false and defamatory statement concerning the plaintiff, (2) an unprivileged communication to a third party, (3) fault amounting at least to negligence on the part of the publisher, and (4) either actionability of the statement irrespective of

special harm (defamation *per se*) or the existence of special harm caused by publication.” *Mitan v. Campbell*, 706 NW 2d 420, 421 (Mich. 2005).

Your public post(s) and statement(s) satisfy each of these elements. Among other things, by publishing the statement on X.com and making various statements to the press, you have falsely accused Mr. Druskinis of “spray painting swastikas” and otherwise espousing antisemitism, which could not be further from the truth. Your statements are verifiably false and defamatory, and the injury to our client’s reputation is self-evidently severe and would support an award of money damages against you.

You have an opportunity to formally retract your statements. MCL 600.2911(2)(b) allows a plaintiff to receive “exemplary and punitive damages”—in other words, a monetary award that exceeds the amount of damage you have done to our client’s reputation, in order to punish you for maliciously seeking to injure them—on top of actual damages, but only if we first demand a retraction. This letter satisfies that requirement.

**Here, our client demands that you (1) immediately delete the X.com post and stopantisemitism.org article identified above; (2) make a subsequent post on X.com and stopantisemitism.org retracting your post and article; and (3) retract each and every false and defamatory statement about Mr. Druskinis, including but not limited to those detailed above, with a written retraction to each media outlet and/or person to whom you sent your statements. Failure to respond may result in our client pursuing legal remedies under the law, including but not limited to filing a lawsuit against you.**

While you are entitled to your opinions and emotions, you are not lawfully permitted to invent and spread false and malicious allegations for the purpose of ruining our client’s reputation. Therefore, be aware that our client is currently evaluating their legal options for vindicating his name.

Feel free to call me at **586-303-4139** to discuss the matter further as we hope to resolve this matter amicably.

Sincerely,



Brian D. Wassom

Enclosures

29372534

# EXHIBIT 1

---

---

Home    Events    Learning    Birthdays     Mission    Who we are    Contact us    DONATE

## Statement on vandalism at JRC

The vandalism found at the JRC was offensive and disrespectful, but did not include any overt anti-semitic symbols (like swastikas). We have been in contact with those responsible and received a private apology, as well as a subsequent public apology. The public apology took place on Shabbat, in front of over 350 people. We deliberately chose Shabbat for the public apology, knowing it would not be recorded, and thus not contribute to further public attacks. We feel continued news coverage of this incident is unwarranted and unfortunate. From our perspective, it was put to rest weeks ago.

Echoing the Rabbi's Shabbat night message: this vandalism took place during the Rosh Hashana and Yom Kippur season. While the theme of Rosh Hashana is judgment, the counter balancing theme of Yom Kippur is understanding and forgiveness. As far as the JRC is concerned, these students aren't bad people and certainly don't need to have their lives ruined. While they made a poor choice, they sincerely apologized, and we have high confidence they won't repeat such actions ever again.